

**United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report**

Case Number

0500-0614

Case Title:

Village of Crestwood, IL

Reporting Office:

Chicago, IL, Area Office

Subject of Report:

Interview of (b) (7)(C), former Water Department employee on April 29, 2009.

Activity Date:

April 29, 2009

Copies to:

Related Files:

Reporting Official and Date:

(b) (7)(C) SA
12-MAY-2009, Signed by: (b) (7)(C), SA

Approving Official and Date:

(b) (7)(C) SAC
15-MAY-2009, Approved (b) (7)(C) SAC

SYNOPSIS

On April 29, 2009, (b) (7)(C), former employee of the Village of Crestwood Water Department and current Chief of Police, admitted to the falsification of Monthly Operating Reports with respect to Standby Well # 1 from approximately 1986 to approximately 2007 and to the yearly falsification of the Consumer Confidence Report from 1999 to approximately 2007. (b) further admitted to placing these documents in the United States Mail. (b) implicated Water Operator (b) (7)(C) and Public Services Director (b) (7)(C).

DETAILS

On April 29, 2009, this Reporting Agent, Special Agent (b) (7)(C) (RA), United States Environmental Protection Agency, Criminal Investigation Division (EPA CID), Chicago Area Office, along with Special Agent (b) (7)(C) (b) (7)(C) EPA CID, interviewed Chief of Police (b) (7)(C) (b) (7)(C), Crestwood Police Department, (b) (7)(C) IL 60445; telephone (b) (7)(C); cellular telephone (b) (7)(C). This interview, which began at approximately 9:35 a.m. and ended at approximately 11:15 a.m., took place in the Chief's Office at CPD. During the interview other Agents were serving a federal search warrant at the Village Hall and the Public Works Department.

Investigation has revealed that, in or around 1986, the Illinois Environmental Protection Agency (IEPA) ordered the Village of Crestwood (Village) to discontinue the use of Well Number 1 (Well), located on Playfield Dr, Crestwood, IL. The Well was owned and operated by the Village. IEPA's order was due to elevated levels of contaminants in samples taken from the Well in that a historic disposal of perchlorethelyne had been discovered just north of the Well. Prior to

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this date, Crestwood used the Well to supplement water purchased from the neighboring City of Alsip; the ultimate source of which was Lake Michigan. This water was sold to residents of the Village. Following this date, Crestwood advised IEPA that Well 1 was in "standby" status and would not be used, except in emergencies. Thereafter, continuing to a date unknown in 2007, the Village sent a Monthly Operating Report (MOR) to IEPA, via the United States Mail, certifying that "zero" gallons had been pumped from the Well and that the Well's pump had been used for "zero" hours. In 1999, federal law required the issuance of a Consumer Confidence Report (CCR) to citizens in the Village, to IEPA. The CCR, which was mailed to residents via the United States Mail, required the disclosure of the source of drinking water. All CCRs from 1999 to 2007 indicated that the Village's source of water was Alsip. The CCR did not disclose the use of Well number 1. Investigation had revealed that the Chief had once been employed as the Water Department Clerk, as a Part Time Police Officer/Detective and had been promoted to Chief in 2008. These facts constitute possible violations of the United States Code with respect to False Statements, Mail Fraud and Conspiracy.

(b) and SA (b) entered the lobby of CPD at approximately 0900. (b) and SA (b) were wearing a blue raid jacket and a black winter raid coat, respectively. EPA CID badges and other patches on these garments indicated our status as EPA CID Agents/Law Enforcement. (b) asked the Receptionist if Chief (b) (7)(C) was in. The Receptionist advised that (b) was due to arrive soon; as this was (b) typical arrival time. The Receptionist placed various telephone call(s) and subsequently advised that people were looking for the Chief to advise (b) of (b) and SA (b) (7) presence. The Deputy Chief came into the lobby, introduced (b) (7)(C), and inquired if (b) could assist (b) and SA (b) (7). (b) advised that (b) could not. While waiting for the Chief to arrive, the Search Warrant Team, including a marked Illinois State Police cruiser arrived at the Village Hall across the parking lot and just east of CPD.

At approximately 0933, the Chief arrived at CPD in (b) privately owned vehicle, a Mercury brand sports utility Vehicle. As (b) entered the lobby of CPD, the Chief acknowledged Agent's presence with a nod; (b) then motioned for Agents to come into CPD, beyond the secured door. (b) then invited Agents into (b) secured office. (b) introduced (b) (7)(C) and SA (b) (7) and our office and advised that the door to (b) office was being closed for privacy. The Chief invited Agents to have a seat.

At approximately 0935, once seated in (b) office, (b) advised the Chief

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that EPA CID was conducting a federal criminal investigation; that a federal search warrant was being served at the Village Hall and another at the Public Works Department. (b) told the Chief that a computer forensics team was going to mirror various computers and seize relevant documents. (b) indicated that interviews of Village employees had been done already, that more interviews would likely occur today and in the future; and that various documents had been reviewed in this investigation prior to today. (b) advised that the investigation was with respect to what had been reported in the meeting; specifically that the "standby Well" had been used and not disclosed to the government for the past 20 years. (b) then advised that EPA CID was requesting (b) cooperation in the investigation. Lastly, (b) advised that today was a very important day in (b) life and that the statement (b) gave would help determine how the U.S. Attorney's Office would proceed.

In summary and not verbatim, unless otherwise noted by quotation marks, the Chief provided the following information, which has been organized by subject matter:

UNATTRIBUTED MOR AND CCR SHOWN AT THE START OF THE INTERVIEW

(b) then clarified that the current investigation has to do specifically with the Monthly Operating Report (MOR) and the Consumer Confidence Report (CCR) sent to the government by the Village.

(b) further advised that the current Mayor, (b) (7)(C) (b) (b) (7)(C)), had admitted in the media, such as newspaper, television etc., that the Village had been using the Well for the past 20 years. RA advised that the MOR and CCRs, which had been sent to the government, indicated, however, that the Well was not being used during this time frame.

(b) then showed the Chief a document entitled MONTHLY OPERATING REPORT, for the month of November 2006; purportedly signed by Water Operator (b) (7)(C) " on December 27, 2006. The document identifies IEPA Operating Permit number 031-0600 for the Village and Water Operator Certificate number (b) (7) for (b) (7)(C)

Item # 2 of the document indicates, amongst other items, that "Hours Pump Ran/Mo" and "Gallons Water Pumped/Mo" had the numeral "0" below each entry. The signature, November 2006 and the hours, gallons had been highlighted in yellow prior to the interview by (b) (b) pointed these

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highlighted items out to the Chief. (b) also indicated that the document had apparently been prepared by at least two individuals in that the writing with respect "November" had a forward slant; while the writing with respect to the Signature had a backward slant. The Chief observed these items when (b) pointed them out.

(b) then showed the Chief a document entitled "Village of Crestwood Annual Water Quality Report 2006, Part 1 Consumer confidence report." (b) had highlighted the passage which stated "Village of Crestwood water source: The village of Crestwood purchases water from the Village of Alsip which is supplied by the City of Chicago." The Chief observed this highlighted statement.

(b) then asked the Chief if (b) knew who wrote these two documents; where they were kept in the Village Hall and upon which computer the CCR was prepared?

INITIAL STATEMENTS REGARDING MOR and CCR and WELL USE

The Chief immediately stated that (b) wrote the CCRs and that the information which appeared on the MOR, such as sampling data and notices of violation, if any, came from the IEPA.

IEPA initially mailed this information to the Village but that, as time passed, (b) was able to retrieve it from IEPA's website. The Chief advised that the format for the CCR changed over time but that the basic information required had been the same.

The Chief then advised that the MOR was generated by hand on the form and that the computer used to generate the CCR was (b) computer located just outside the Village Clerk's Office in the Village Hall.

(b) does not know the current location of these documents because (b) has not worked in the Village Hall for one year. However, prior to (b) promotion to Chief of Police, these documents were kept in the file cabinets in the Village Hall, "off of the Clerk's Office." The particular file drawer is marked something like "Water Department."

(b) asked the Chief why the Well had been used for so long after the Village told IEPA that it was not used. The Chief replied that "I can not tell when the well was turned on and off." (b) (7) then added "I worked in the office. I don't know anything about that."

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(b) then referred the Chief back to the MOR (b) had just seen and directed (b) attention to the zeros under the hours the pump ran and the gallons the pump extracted from the Well. The Chief advised that (b) was not sure what was referred to a Standby Well 1. However, after looking at the document, (b) replied "I can't say if the zeros on the MOR are accurate."

(b) then asked the Chief, if it would be would this be accurate or not for each and every month since 1986, when the Village had told IEPA that the Village was not using the Well, the numbers representing gallons pumped and hours of pump operation for the Well, were always zero, The Chief concurred that it would not be accurate to say the pump never operated and that no water was pumped.

COLUMNAR DOCUMENT 10-31-86 to 10-30-07

(b) then showed the Chief a seven page document, all of which had been written on columnar paper. The first entry on the document is dated October 31, 1986. The most recent entry is located on page 2 and is relevant to October 31, 2007. The headings for the columns are from left to right: "Year, Month, Crestwood Pumps, Gallons Billed by Alsip, Gallons Billed to Crestwood Residents."

The Chief reviewed the seven pages, one by one, and then admitted that the handwriting was all (b) (7) (b) (7)(C) [REDACTED]

(b) (6)

The numbers for Crestwood Pumps are the total gallons that entered the Crestwood water system. These numbers were derived from the sum of daily readings which were taken by (b) (7)(C) (b) presumes (b) (7)(C) looked at an unknown meter.

(b) pointed out that there seemed to be more water being pumped into the water system than the Village was purchasing from Alsip. The Chief concurred that this was the case.

(b) subsequently showed the Chief the columnar document (b) had previously seen and asked (b) (b) (6), (b) (7)(E) [REDACTED]

(b)

(b) asked about the purpose of columnar report. The Chief advised that it was for an internal annual report with respect to what water was billed,

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what water was used and what was provided to the Village.

SIGNING ON BEHALF OF (b) (7)(C)

(b) then showed the Chief the MOR (b) had previously reviewed and redirected (b) attention to the values under the heading with respect to gallons pumped and hours the pump operated with respect to the Well. The Chief indicated that (b) was not involved in writing down these values. (b) (7)(C) wrote down these numbers.

(b) asked if (b) signed the document using (b) (7)(C) name. The Chief admitted that (b) did with (b) permission. (b) asked if (b) had signed these forms for a long time, such as the past 12 years, for example. The Chief indicated that (b) can not say if (b) signed all of the forms (b) (7)(C) but did sign most of them. (b) concurred that signed them for (b) (7)(C) on a "routine and regular" basis. When asked why (b) signed the reports and not (b) (7)(C), the Chief advised that (b) signed (b) (7)(C) name to "get the reports out when (b) (7) was not around."

(b) then asked if (b) was aware while (b) was making the MORs and CCR if (b) knew that the pump was being used. (b) then stated that "I'm not going to say that I didn't know that the pump was being used."

COOPERATION WITH THE INVESTIGATION

(b) then advised that (b) (7)(C) and others were cooperating with the investigation and had admitted their personal involvement. (b) further decided that (b) had been implicated in this investigation. Lastly (b) advised that (b) needed to decide if (b) wished to cooperate as well. (b) advised that making a false statement was a criminal offense and was an offense separate and distinct from the offenses that EPA CID was currently investigating. (b) advised that (b) could elect to terminate the interview right now and that (b) would get up from the chair and leave. (b) advised that this was (b) right. (b) advised that (b) was not under arrest nor would (b) be taken into custody today. (b) advised the (b) was going home tonight; just like (b) (b) reminded (b) that the door had been closed for privacy at the beginning of the interview.

USE OF THE WELL

The Chief then admitted that (b) was aware that the Well was being used for the past ten years, routinely and regularly. The idea to use the

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Well and to tell the lies to IEPA and the Citizens was not (b) idea. (b) did not benefit from it directly other than it provided (b) a paycheck and (b) kept (b) job.

(b) then concurred that the idea to use the Well and to tell the lies that were told was not (b) (7)(C) either.

(b) then showed the Chief the MORs and asked if (b) signed the majority of them. (b) admitted that (b) did. At the time (b) signed these documents, (b) knew the Well was being used and that the use was therefore being fictitiously reported as zero.

(b) asked why the Well was being used after the Village told IEPA that it was not. (b) did not know.

The Chief then explained that (b) was hired in 1976 when (b) was just 18 years old to do general office work in the Village Hall. (b) then stated that "If I was being set up for something, I didn't know it.

ADMISSION TO FALSE STATEMENT - MOR

(b) again showed the Chief the MOR previously described. (b) then asked (b) to put (b) initials and today's date on the document next to the signature for (b) (7)(C). The Chief initialed the document (b) (7) and dated it "4/29/09." (b) then asked (b) if (b) signed it on behalf of (b) (7)(C) (b) (6), (b) (7)(E) (b) initials and the date. (b) (6), (b) (7)(E) (b) (7)(C) (b) then (b) (6), (b) (7)(E) and dated it "4/29/09."

(b) then asked (b) whether these numbers were the truth or a lie. The Chief indicated they were not true. (b) (b) (6), (b) (7)(E)

Later in the interview the Chief advised that (b) began to work on the MOR in the early 1980s, possibly in 1981. (b) was initially shown how to fill out the MOR by the Village Clerk. At that time, the Well was being openly used. It was not until 1986 that the falsification of the MOR began.

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(b) began doing the CCRs when they first became required. (b) believes that (b) had prepared them for approximately 10 years. (b) did them all with (b) (7)(C). (b) later indicated that (b) (7)(C) brought (b) documents (b) had received from IEPA regarding the CCR; including the format and requirements. (b) typed them on (b) computer. (b) advised that it appears that the argument could be made that (b) and (b) (7) a had aided and abetted one another in the conspiracy to make false statements. The Chief advised that (b) was "just a worker and was not told why or why not or whatever. According to the Chief (b) (7) and I never agreed" to commit any crimes.

Later, the Chief advised that (b) (7)(C) explained what had to go into the CCR. Some paragraphs had to stay the same per EPA" (b) does recall typing the statement in the CCR identifying that Lake Michigan was the only source of water for the Village. (b) did not come up with the information that went into the CCR on (b) own.

MAIL FRAUD

The Chief admitted that (b) placed the CCRs into the mail bins for distribution and sent the document to IEPA via the U.S. Mail. The Chief conceded that the residents that were paying for their water via the U.S. mail and who had received their water bill through the U.S. Mail were being defrauded in that they were not receiving all clean water as they were being told and had paid for. The Chief confirmed that the water bills and payments were both sent and received in the U.S. Mail.

The Chief also admitted that the MOR was sent every month by (b) through the U.S. Mail.

RESPONSIBILITY FOR FALSIFICATION

(b) (7)(C) took (b) direction from the Village Services Director or the Mayor with respect to pumping from the Well. When asked how (b) knew this, the Chief was unable to specify exactly how.

The Village Services Director was (b) (7)(C) (b) (7)(C) for the majority of the years the Well was being used. (b) asked if (b) had spoken to (b) (7)(C) about the use of the Well or the falsification of the MOR or CCR. (b) did not have regular conversation with (b) (7)(C) at Village Hall or elsewhere.

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(b) did not receive the water bills from Alsip for payment. However, (b) has seen them from time to time and is aware they specified the number of gallons of water that was purchased. This information was recorded and given to (b) for inclusion in (b) records.

The Chief then indicated that (b) did not intend to continue signing documents, such as the MOR, knowing the report was false. (b) conceded that this was a possible defense for the first few MORs (b) prepared. However, (b) advised that it would not be a defense after (b) signed the documents in the second through 21st years; 1986 to 2007 and that the jury would not likely believe this defense. The Chief agreed that (b) was correct.

(b) advised that as of now, it appears as if (b) and (b) (7)(C) were the only co-conspirators in the false statements scheme and the Mail Fraud Scheme. (b) advised that it would be in (b) best interest to fully cooperate with this investigation and give truthful information about any others who had participated.

After consideration, the Chief advised that (b) never spoke to the Mayor about the Well being used. (b) can not recall any such conversation. Instead, (b) was just an office (b) (7) and did not talk to the Mayor about such things. (b) (7)(C) or (b) (7)(C) would have that duty; not (b).

When asked about (b) (7)(C) involvement, the Chief advised that (b) can not recall any specific conversation with (b) (7)(C) about the Well being used either. However, (b) later recalled that "yes, I'm sure I did [have such conversations]." If such conversation did occur they would have occurred in the Village Hall. This was so because (b) worked in the office then and did not go to Public Works or the Well/Storage Tanks. Regardless, (b) is unable to presently recall the nature of any such conversation.

On the other hand, (b) had many conversations with (b) (7)(C) about the Well being used. (b) never told (b) (7)(C) in response to (b) complaints, about the well being used, words to the effect of "that is how it had to be" or "we have to do what we have to do." (b) never had any conversations with (b) (7)(C) about directions (b) may have been getting from the Mayor or (b) (7)(C) about the Well matter either.

(b) never spoke with (b) (7)(C), the Village Clerk, about the Well being used or the falsification of the MORs or the CCRs.

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The Chief never questioned the Well being used after IEPA was advised that it was not. Similarly, (b) never questioned the CCR not mentioning its use. (b) never questioned the MOR falsification either. (b) simply prepared and signed the MORs as indicated. The Chief readmitted that at the time (b) signed the MORs and prepared the CCRs (b) knew that they were not accurate and were therefore false statements.

The Chief advised that (b) wished to cooperate with the investigation and that if (b) had information that implicated the Mayor or (b) (7)(C), (b) would tell (b) and SA (b) (7).

ADDITIONAL PAGES IN THE MOR

According to the Chief, there were more pages in the MOR than the example shown to (b) earlier. As a result (b) showed the Chief additional pages from the MOR for December 2006.

(b) showed the Chief a document entitled MONTHLY OPERATION AND CHEMICAL ANALYSIS REPORT for the month of December 2006. The document was purportedly signed by (b) (7)(C) at the bottom. After reviewing the numbers on the report, the Chief advised that this document was part of the MOR. (b) prepared this document, including the numbers of gallons of "Water Treated." The numbers were given to (b) by (b) (7)(C). (b) signed (b) (7)(C) name on this form too. After reviewing the document, the Chief initialed the document (b) (7) and dated it 4/29/09. (b) was not familiar with the numbers with respect to chlorine dosage. These numbers came from (b) (7)(C) as well.

(b) then showed the Chief a document with 13 columns entitled CRESTWOOD PUBLIC WATER SUPPLY SUMMARY OF MONITORING WATER TREATMENT for 2006. After reviewing the numbers on the report, the Chief advised that this document was also part of the MOR and that (b) prepared this part. The numbers were given to (b) by (b) (7)(C).

(b) next showed the Chief a document with 13 columns entitled SUMMARY OF MONITORING FINISHED QUALITY CRESTWOOD PUBLIC WATER SUPPLY for 2006. After reviewing the numbers on the report, the Chief advised that this document was also part of the MOR and that (b) prepared this part. The numbers were given to (b) by (b) (7)(C).

(b) finally showed the Chief a document with three columns entitled CRESTWOOD COMMUNITY WATER SUPPLY, dated January 30, 2007, purportedly

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signed by (b) (7)(C) . After reviewing the numbers on the report, the Chief advised that this document was also part of the MOR and that (b) signed and dated the bottom of the form for (b) (7)(C) . The reference to a six inch water main break handwritten on the form was identified by the Chief as having been made by (b) (7)(C) .

The Chief indicated that these four additional documents were part of the MOR and that (b) made these for the many years along with the documents falsely indicating no water had been pumped from Well 1. These documents were all mailed along with the page which falsely indicated no water had been pumped from Well 1.

EMPLOYMENT HISTORY

(b) has been the Chief of Police for about eight months. (b) started with the Village in 1976 as a Clerk, when (b) was 18 years old. (b) graduated from the Police Academy in Champaign, IL about nine years ago. After graduation, (b) was a Patrol Officer and then was subsequently promoted to Detective and then Detective Sergeant. From Detective Sergeant (b) was promoted to Chief of Police.

(b) was not promoted to the Chief of Police in order to keep (b) silence about the use of the Well. The Chief became agitated at this question but was advised that others had opined that was the case. The Chief advised that (b) was promoted because (b) was qualified for the job.

At one time, (b) was working full time in the Police Department and part time as a Clerk in the Village Hall. The Village Hall has always been located where it is currently.

MISCELLANEOUS

Bills for maintenance and repair on the Well over the course of its operation were kept in the files. Payment for Village expenses were brought before the Board of Trustees and were voted on. This procedure included the Well expenses and repairs. These expenditures were known as warrants.

(b) asked the Chief if (b) had spoken to (b) (7)(C) in the past few days. The Chief immediately denied (b) had.

The Chief refused to take Agents to (b) former computer in City Hall and

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also refused to come to City Hall to identify exactly which file drawer (b) was referring to. (b) indicated that the Agents conducting the search will find them.

(b) requested that the Chief prepare a voluntary written statement acknowledging (b) involvement in making false statements in the CCR and the MOR. The Chief refused to make the statement. The Chief advised that Agents had already heard enough.

(b) asked the Chief if (b) would become an informant for the government and make recorded phone calls to anyone. The Chief refused.

(b) asked the Chief if all the information (b) had provided and been true and complete. The Chief advised that (b) had told the truth. (b) asked if there was any information that (b) wished (b) and SA (b) (7) to know about relevant to the use of the Well and the falsification. The Chief indicated that (b) had nothing further to add. (b) provided (b) business card with cell phone number written on the back and advised the Chief to contact (b) if (b) recalled any other information.

(b) asked the Chief if (b) and SA (b) (7) had treated (b) with courtesy and respect. The Chief indicated somewhat but that (b) did not like the question about how (b) became Chief. When asked to exclude (b) feelings on that question the Chief indicated that she had been treated with courtesy and respect.

(b) advised the chief to immediately contact EPA CID if (b) were threatened, coerced or received any negative or detrimental treatment by anyone regarding this investigation. (b) then warned the Chief that (b) should not contact any witnesses in this matter, nor have anyone do so on (b) behalf, in an attempt to conduct a CPD investigation.

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